

4 October 2018

Ms Leanne McCauley
Director, Advertising Compliance Unit
Therapeutic Goods Administration
PO Box 100
Woden, ACT 2606

E: advertising.consultation@tga.gov.au

Dear Ms McCauley,

Re: Proposed therapeutic goods advertising code guidance

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide feedback and comments to the Therapeutic Goods Administration's (TGA's) *proposed therapeutic goods advertising code guidance*.

The RACGP previously provided feedback and comments on this issue to the [Senate Inquiry into the Therapeutic Goods Amendment \(2017 Measures No. 1\) Bill 2017 and Therapeutic Goods \(Charges\) Amendment Bill 2017](#), and during this draft's consultation phase. We would again like to highlight the RACGP's key recommendations in our current submission to this consultation.

For consumer safety and education, it is important that all tradition-based health claims be accompanied by a statement that notes there is no scientific evidence to justify that claim. The RACGP recommends the TGA create a mandatory obligation that requires manufacturers to include a statement to accompany all non-scientific therapeutic claims. This statement should be positioned in close proximity and in the same font as the health claim.

The lack of regulation around therapeutic claims for food, provides an inappropriate alternative pathway for manufacturers to promote unsubstantiated health claims. The RACGP recommends broadening the scope of the *Therapeutic goods advertising code* to include food and other products to protect consumers from unjustified claims by manufacturers.

There is a need to balance the benefits and harms of advertised medicines to enable consumers to make informed choices. In particular, consumers should be provided accurate information when purchasing complementary and alternative medicines.

The RACGP is especially concerned about the listing of 'permitted indications'. These statements that describe the specific therapeutic use for a medicine or claimed health benefit discount the need to have clear evidence-based information.



RACGP

Royal Australian College of General Practitioners

Healthy Profession.
Healthy Australia.

Thank you once again for the opportunity to provide feedback and comments. We look forward to hearing about this consultation's progress and outcomes.

Yours sincerely

Dr Bastian Seidel
President